UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

In the matter of:

United States of America : Case No.: 2:25-mj-253

v.

Brett J. Farley

354 Pecan Court : Magistrate Judge Vascura

Delaware, OH 43015

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Matthew W. Guinn, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state:

INTRODUCTION AND BACKGROUND

- 1. I, Special Agent Matt Guinn (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b) advertising/solicitation for/or, sexual exploitation of a minor and distribution/receipt/possession of visual depictions of minors engaged in sexually explicit conduct (hereinafter "child pornography"). Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Brett J. Farley (FARLEY)) committed the violations listed above.
- 2. I am a Special Agent (SA) with the FBI and have been since April 2012. I am currently assigned to the Child Exploitation and Human Trafficking Task Force Crimes Against Children Squad, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children.
- 3. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have received both formal and informal training in the detection and investigation of computer-related offenses involving children. As part of my duties as a SA, I investigate criminal violations relating to child exploitation and child pornography, including the online enticement of minors and the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A.

PROBABLE CAUSE

- 4. On or about April 19, 2025, an approximately 14-year-old minor female (hereinafter referred to as MINOR VICTIM 1) and MINOR VICTIM 1's family contacted the Carencro Police Department, in Carencro, Louisiana, in reference to MINOR VICTIM 1 speaking to an adult online. Interviews were conducted and MINOR VICTIM 1's cellular phone was forensically examined with consent. The forensic review of MINOR VICTIM 1's cellular device is ongoing.
- 5. The initial investigation into the report related to MINOR VICTIM 1 revealed on or about April 2, 2025, a SnapChat user with the username "yast4rc4th3er" and screen name "STAR CATCHER" contacted MINOR VICTIM 1 on the mobile application SnapChat. MINOR VICTIM 1 confirmed her age, 14 years old, and shortly after, STAR CATCHER engaged in a sexually explicit conversation with MINOR VICTIM 1 on SnapChat. During the exchange, STAR CATCHER sent a video of himself masturbating and requested images of MINOR VICTIM 1's genitals and buttocks. MINOR VICTIM 1 refused to send an image of her genitalia but sent an image of her buttocks.
- 6. Prior to reporting STAR CATCHER to law enforcement, MINOR VICTIM 1 copied her SnapChat messages with STAR CATCHER and pasted them to her "notes" application on her phone. MINOR VICTIM 1 then blocked STAR CATCHER on SnapChat and was unable to review her messages with STAR CATCHER on SnapChat. MINOR VICTIM 1 did not include the dates or times of the messages in her notes. Based on the information obtained, the chats between MINOR VICTIM 1 and STAR CATCHER occurred sometime between April 2, 2025 and April 19, 2025. Below is a portion of the notes captured by MINOR VICTIM 1 from her SnapChat conversation with STAR CATCHER:

STAR CATCHER: Tell me your age [REDACTED]¹

MINOR VICTIM 1: 14

STAR CATCHER: Oh yeah baby?

U look so underage in your pfp²

Your pfp is so hot lil girl. How old is that pussy...?

Oh yeah you like that? It's a compliment to you?

[MINOR VICTIM 1]...

Js³ show me baby [heart emoji]

MINOR VICTIM 1:

i don't wanna

STAR CATCHER:

Mmm u have to love

U make me feel so good

U make my heard pound

MINOR VICTIM 1:

STAR CATCHER:

Idk js show me baby

Js be a good girl for me

¹ The subject mentions MINOR VICTIM 1's first name. This will not be included in the affidavit to protect the minor victim's identity.

² Based on your affiant's experience, "pfp" stands for "profile picture."

³ Based on your affiant's experience, "Js" stands for "just saying."

I'd suck on both those 14 year old underage minor tiddies.

U gotta tell me your age when I'm playing with ur naked body in your room.

& when ur sucking my dick on ur knees

& when I'm eating ur little pussy out from the back & front.

& pounding u deep lil girl.

Ur js a lil 14 year old hoe sometimes

For adult men

Or maybe only me? Idk I talked to a 14yo girl?

Sexually

& saw her & did stuff on the dark web

STAR CATCHER:

I want to come over there ...

MINOR VICTIM 1:

У

STAR CATCHER:

Lowkey Yk⁴ why baby

I wanna see you

MINOR VICTIM 1:

no you don't

STAR CATCHER:

Let me see ur underage ass & pussy baby. I

wanna pound a 14yo girl specifically u Ur hair, makeup & body is extremely hot &

Pretty

- 7. Between the dates April 2, 2025 and April 19, 2025, MINOR VICTIM 1 took a screen shot of a message she received from her juvenile male friend that was sent from STAR CATCHER that stated: I will get head from that bitch⁵ & pound her 14yo pussy right in front of you & you won't do a damn thing about it...
- 8. On or about April 19, 2025, sometime after MINOR VICTIM 1 blocked STAR CATCHER on SnapChat, an individual using the phone number (310) 803-9551 contacted MINOR VICTIM 1 and MINOR VICTIM 1's parent. MINOR VICTIM 1's parent did not respond to the messages. The messages sent to MINOR VICTIM 1's parent stated: Let's play a new game...I was fuckin your daughter...
- 9. On or about April 19, 2025, while Carencro Police Department officers were speaking with MINOR VICTIM 1's family, a pizza was delivered to the family's home address. The pizza was not ordered by the family. Officers obtained a copy of the receipt and the phone number on the order was (310) 803-9551.
- 10. Law enforcement, using law enforcement databased, learned that the phone number (310) 803-9551 was linked a phone number provided in law enforcement report in Delaware, Ohio. More specifically, that number came from a report that was generated on April 17,

⁴ Based on your affiant's experience, "Yk" stands for "you know".

⁵ Based on the surrounding circumstances, your affiant believes STAR CATCHER was referring to MINOR VICTIM 1 as "that bitch."

2025, when a female, T.F., contacted Delaware Police Department to report a decline in mental health of her family member. Officers responded to T.F.'s residence at 354 Pecan Court, Delaware, Ohio 43015. T.F.'s family member indicated that, Brett FARLEY, who resided with her, was self-medicating with kratom and refused to take his prescribed medication. Delaware Police officers observed a bottle of buprenorphine⁶ prescribed to FARLEY. FARLEY provided Delaware Police Department with the phone number (310) 803-9551 as his personal phone number. During the conversation with police, FARLEY informed them he made music.

- 11. Further investigation revealed **FARLEY** was associated with multiple Delaware Police Department police reports. One of those reports dated April 11, 2025, involved a phone call Delaware Police Department received from an investigator with Fort Collins Police Services, in Fort Collins, Colorado. In that report, **FARLEY** was identified as a subject in a Colorado sexual exploitation case in which **FARLEY** was suspected of sending inappropriate photos to juveniles in Colorado. Law enforcement learned that the Colorado investigation was still ongoing as well.
- 12. Carencro Police Department investigators served a search warrant to SnapChat requesting the contents of known accounts for **FARLEY** and MINOR VICTIM 1. A response to that request from SnapChat is pending.
- 13. On or about April 22, 2025, Carencro Police Department investigators interviewed MINOR VICTIM 1 and her mother. MINOR VICTIM 1 provided descriptors of STAR CATCHER that she had received from him, which included white male, long dark hair and a beard, droopy eyes, sometimes wore glasses, 25 years old, resides in Ohio, in the background of his room he had LED lights, would consume kratom, was born in California, was not employed, made music, his name started with a "B" and had five letters, his birthday was in January and the day was between the 4th and 13th.
- 14. Your affiant would note that **FARLEY**'s date of birth is January 5, 2000 and matched most of the descriptors provided by MINOR VICTIM.
- 15. Based upon the foregoing, your affiant submits that there is probable cause to believe that Brett J. **FARLEY** has committed violations of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b) advertising/solicitation for/or, sexual exploitation of a minor and distribution/receipt/possession of visual depictions of minors engaged in sexually explicit conduct (hereinafter "child pornography"). Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

Matthew W. Guinn

Special Agent

Federal Bureau of Investigation

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⁶ Based on your affiant's training and experience, buprenorphine was commonly prescribed to treat substance abuse disorder.

Sworn to and subscribed before me this 30th day of April, 2025.

Honorable Chelsey M. Vascura
United States Magistrate Judge